

## **EXHIBIT “4”**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE CO., ET AL.

Plaintiff,

Case No.

1:20-cv-01214 (RRM) (SMG)

-against-

NORTHERN MEDICAL CARE, P.C., ET AL.

Defendant.

- - - - -  
VIA VIDEO CONFERENCE

THE STATE OF NEW YORK

December 03, 2020

12:01 p.m.

DEPOSITION of ALLA KURATOVA, the Non-Party Witness, by the Plaintiff, in the above-entitled action, held at the above time and place, pursuant to Subpoena, taken before JENNIFER SIMMONS, a shorthand reporter and Notary Public within and for the State of New York.



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KURATOVA

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2 Q. Okay. What is your current status  
3 here in the United States?

4 A. The same. I have a green card.

5 Q. Ms. Kuratova, have you ever been  
6 convicted of a crime?

7 A. Yes.

8 Q. What crime?

9 A. I don't know how to explain. In '15 I  
10 pleaded guilty, felony B. I was not arrested and  
11 I had a three year conditional discharge, so it's  
12 over now.

13 Q. What were you accused of doing?

14 A. I was accused of possessing some  
15 medications. I've been using them for 10 years.

16 Q. Ms. Kuratova, are you represented by  
17 an attorney?

18 A. Kuratova, Kuratova. (Pronouncing)

19 Q. Okay.

20 A. I don't know. I have a lawyer, but I  
21 don't know whether he's working right now.

22 Q. Are you prepared to go forward with  
23 this deposition right now?

24 A. What do you call a deposition?

25 Q. This proceeding. Are you prepared to



1 KURATOVA

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2 answer my questions?

3 A. I am ready to answer your questions.

4 Q. Okay. Have you ever heard of a  
5 company called Northern Medical Care, PC?

6 A. No.

7 Q. All right. Are you familiar with a  
8 person named Dr. Omar Ahmed, A-H-M-E-D?

9           A.       No. I have two doctors whose last  
10      names I can just pronounce for you.

11 O. Who are they?

## **A. My family doctor and the cardiologist.**

13 Q. Do you know their names?

14 A. Dr. Radcliff and Dr. Birken.

Q. All right. Do you know some

## 16 Howard Greenleaf?

17 A No

18 Q. Do you know someone named Sam Timmat,  
19 T. T. M. M. A. T. 2

20 **A** No.

21 Q. Do you know someone named Neil Laster,  
22 L.A. S.T.E.P.2

23 A No

24 Q. Do you know someone named Mary Recaro,  
25 B. E. G. A. B. Q3



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KURATOVA

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2 THE INTERPRETER: Sorry, I clarified  
3 something. Because in the beginning she  
4 said the same office with breaks.

5 BY MR. HENESY:

6 Q. Do you currently live with anyone?

7 A. **My mother.**

8 Q. Anyone else?

9 A. **No.**

10 Q. Besides working as a home attendant do  
11 you do anything else to get money or income?

12 A. **No.**

13 Q. All right. Have you ever been to a  
14 check cashing -- withdrawn.

15 Have you ever been to a check casher in  
16 the state of New Jersey? [Sic]

17 A. **No.**

18 Q. Okay. Have you ever been to any  
19 business or any -- withdrawn.

20 Have you ever been to anything located at  
21 6 Market Street, Clifton, New Jersey?

22 A. **No. But, yes, I was in Clifton two or**  
**three years ago at the wedding of my niece.**

24 Q. Okay. Besides being in Clifton for  
25 your niece's wedding, have you ever been to



1 KURATOVA 11

2 Clifton, New Jersey?

3 **A. No.**

4 Q. Have you ever taken a check to a check  
5 cashier on behalf of a doctor or medical practice?

6 **A. No.**

7 Q. Do you know someone named Jerome Reed?

8 **A. No.**

9 Q. Are you familiar with a company called  
10 United Check Cashing?

11 **A. No.**

12 Q. Okay. GEICO has received information  
13 indicating that you presented checks issued to  
14 Northern Medical Care to a check casher in  
15 Clifton, New Jersey. Is that true?

16 **A. No.**

17 Q. Have you ever presented -- withdrawn.

18 GEICO was provided a copy of your  
19 driver's license by the owner of a check cashing  
20 company in New Jersey. Do you have any reason to  
21 know why a check casher in New Jersey would have  
22 a copy of your driver's license?

23 **A. GEICO used to be my insurance. My**  
24 **vehicle was insured by GEICO before, maybe five**  
25 **or six years ago -- no. The car was registered**

